

Authorization Basis Amendment RequestABAR Title: Revision of Employee Concerns Program Description DocumentABAR #: ABAR-W375-99-00001 Revision: 2 Associated ABCN #: ABCN-W375-99-00020Originator: M Eades Date: 26 April 2000
Print NameDescription of proposed revision:

A complete revision of "Employee Concerns Program Description and Instructions," BNFL-5193-ECP-01, Revision 0. This document was written for Part A and served as both the program plan and the procedural instructions. The administration of the program has changed for Part B and the procedural instructions have been placed in Project controlled documents (e.g. procedures or codes of practice). To facilitate these changes, Revision 1 was prepared and the name of the document has changed to "Employee Concerns Program Plan." The RU did not accept Revision 1 submitted in ABAR-W375-99-00001, so another revision of the ECP was prepared in addition to a revised ABCN and ABAR. Revision 2 of the ECP is being withdrawn so the ABCN, the ABAR, and the Safety Evaluation are being revised again to reflect the newest revision (3) that is being submitted to the RU.

In addition to the document title change, specific changes are summarized: (a) instructions for evaluation and categorization of a concern have been moved to the ECP Code of Practice; (b) detailed procedure steps for reporting a concern, receiving a concern report, investigating a concern, resolution of the concern, and reporting program status have been moved to the ECP Code of Practice; (c) a single Project ECP Officer position supported by Project ECP coordinator(s) has been created to replace the approach in which partner companies also assumed the responsibility for providing ECP staff in their home offices; (d) the Program plan document continues to establish the framework but the details of specific staff responsibilities have been moved to the ECP Code of Practice; (e) immediate action determination has been moved to the ECP Code of Practice; (f) instructions for reporting to outside agencies have been moved to ECP Code of Practice; (g) investigation guidelines have been moved to the Investigations Code of Practice; (i) forms have been moved to the ECP Code of Practice; (j) clarification that the program is consistent with the contract with DOE.

Reason(s) for the proposed revision:

Revision 0 of the ECP was developed for a project where the assigned staff members, working for different companies, were in several different locations. In this early phase of the project, no systematic procedural program was in place. Therefore, the steps to be followed and identification of the responsible individuals for the implementation of the ECP were located in the program description. Following initial program implementation, the RU determined that the program description document was part of the Authorization Basis. With the implementation of the BNFL Inc. business model, a program for the development and implementation of procedures was initiated. In keeping with the new system, procedural steps for the implementation of any program (of which the ECP is only one) were described in procedures or codes of practice. The steps and the project organization contained in Revision 0 do not reflect the current project organization. To reflect organizational changes, responsibilities, and reassignments, the ECP document revision is necessary.

The proposed revision has been compared to the attributes provided as guidance in RL/REG-96-03, revision 0. The proposed revision continues to provide the Key Elements identified for an effective program.

Description of the proposed implementation schedule:

A. Relocation of procedural instructions: Within 30 days following RU acceptance of ABAR. Upon RU approval of the proposed ECP revision, the instructions will be removed from the AB. At this time the instructions are also included in codes of practice.

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B. Identification of Part B ECP staff: The Part B ECP officer and coordinator have been identified to the staff. Their names and phone numbers have been posted in project buildings. This information is not available in revision 0 of the ECP.

C. An ECP was implemented in Part A and remains in effect. The parts of the program that represent changes from the program implemented in Part A involve the identification of ECP staff

In summary, all aspects of the revised ECP will be implemented within 30 days following RU approval of the ABAR

If the revision involves the deletion or modification of a standard previously identified in the approved SRD, provide:

- A. An evaluation that demonstrates the revised SRD continues to identify a set of standards that will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards; and
- B. A certification that the revised SRD identifies a set of standards that continues to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

Attachments:

- 1. Copies of the AB document(s) or appropriate excerpt showing the proposed revision(s).
- 2. Copy of safety evaluation.
- 3. If not included above, justification for the revision and demonstration that the revision is safe.
- 4. Items A and B above, if applicable.

Manager, Engineering

Date

Radiological, Nuclear, and Process Safety Manager

Date

Manager, Quality Assurance

Date

Chairman, Project Safety Committee

Date

RPP-WTP General Manager

Date